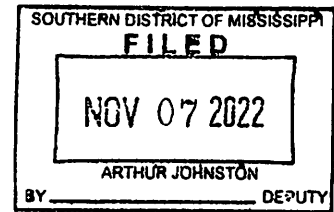


Karen Yax
Lapeer, Mi 48446
810-834-0682
KayKaydoo2@Gmail.com
IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF Mississippi
Northern division



Rae Andreacchio,
Plaintiff,
vs.
Karen Yax,
Defendant
Case No.: CIVIL ACTION NO: 3:21-cv-00386
Dated 10-26-2022

10-31-2022

Defendant's Response to Plaintiff's 10-30-2022 Response: Truth Is Ultimate Defense to Defamation Per Se

Introduction

On June 4th, 2021, Plaintiff filed vexatious, meritless suit against Defendant for Defamation Per Se and or in the alternative false light.

Plaintiff, a limited purpose Public figure and counsel have intentionally and with prior knowledge filed malicious suit against Defendant and/or had knowledge or reason to know that Plaintiffs claim of Defamation Per Se against Defendant are groundless.

Defendant filed a motion to dismiss based on two elements:

Lack of Jurisdiction, Failure to State a Claim, raising truth in assertion to the claim of "Defamation"

Defendant is still waiting on an evidentiary hearing, and further, a ruling on her motion for summary judgement.

Defendant will show that Plaintiffs action cannot survive based on the elements of Defamation in Mississippi

Bare, vague recitations on behalf of Plaintiff against Defendant alluding to alleged comments made on YouTube by Defendant is not a factual enhancement.

Without having the ability to dispute the content of alleged "recordings" or authenticity of such recordings in whole or part.

Nevertheless,

Plaintiff fact #1

"Plaintiff has attempted to control the narrative about what happened to her son Christian Andreacchio"

and I'm going to continue to lay that groundwork and continue to provide proof of the things I claim that she has attempted to control the narrative via intimidation, bullying lies, bribery, getting people drunk, getting young people drunk etc etc"

Truth is an absolute Defense to Defamation Per Se.

Response

Plaintiff **DID** attempt to bribe and solicit false statements from underaged witnesses as supported by supplementary evidentiary materials attached herein and labeled (for the purpose of compiling unfavorable false witness testimony against Whitley Goodman.)

- "Recorded Phone call" between Frankie Wagner and Jordan Edward recorded 8/22/2019 and made public the same time, wherein Jordan Edwards details the Andreacchio's bribing her with cash and marijuana for incriminating Whitley Goodman in the death of Christian Andreacchio: <https://recordings.tapeacall.com/t/hcRgzb1WmIXr>
- Recorded and publicly published video depicting recorded phone call between Frankie Wagner and Jordan Edwards published on a public social media forum several years prior to Plaintiff filing meritless claim against defendant: <https://www.youtube.com/watch?app=desktop&v=ppARsPjq1E4&feature=youtu.be>
- Affiliates/family members of Plaintiff demonstrating awareness of such materials in existence circulating within public forums two years prior to Defendant filing meritless claim against Defendant. (Exhibit A1-4)
- "Screen Shot text message of Plaintiff's daughter Alexa Andreacchio to Hunter Thornton re: offering financial incentive on behalf of Rae Andreacchio to get incriminating statements from Makayla Casselman against Whitley Goodman in the death of Christian Andreacchio. Plaintiff's daughter relays message to Hunter Thornton from her mother Rae Andreacchio to "get Makayla so fucked up that she tells what Whitley told her she'll throw \$10,000 your way. But you have to get it on recording." Dated 11-13-2017, several years prior to Plaintiff filing meritless claim. (Exhibit B)
- Plaintiff Rae Andreacchio on 9-23-2019 publicly admitting the following quote: "You know, I've done all kinds of things trying to get justice for Christian, you know I've bluffed people, I've lied to people, I've done all kind of things just trying to get to what happened." <https://www.youtube.com/watch?v=Zhfg3IRYvzY>

Respectfully submitted on this day,
11-4-2022

Defendant, Karen Yax

Pro Se


Certificate of Service

I hereby certify that Karen Yax

Relayed and furnished certified copies to Plaintiff and Counsel

Rae Andreacchio/Matt Wilson
By way of US Postal Mail